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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SCOTT STERLING, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, BELINDA
NUCIFORA, DAVID BARTHOLOMEW,
CHRISTOPHER GUZOWSKI, and MICHAEL
ALFRED,

Defendants.

Case No. 2:22-cv-07273-JMV-MAH

**NOTICE OF MOTION AND MOTION
OF ERIK KEYSER FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF COUNSEL**

MOTION DATE: March 20, 2023

PLEASE TAKE NOTICE that Erik Keyser (“Keyser”) respectfully moves this Court for an order: (1) appointing Keyser as Lead Plaintiff pursuant to Section 27 of the Securities Act of 1933 (the “Securities Act”) and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Keyser’s selection of Glancy Prongay & Murray LLP as Lead Counsel and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Liaison Counsel for the proposed class; and (3) granting such other relief as the Court may deem just and proper.

In support of his motion, Keyser relies on the attached memorandum of law, declaration of James E. Cecchi and exhibits thereto, and such other papers as may be filed in support of this motion. A proposed order is also submitted herewith.

DATED: February 13, 2023

Respectfully submitted,

**CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.**

By: /s/ James E. Cecchi
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